REMARKS

Claims 1-14, 20-22 and 24-33 have been examined and rejected. Claims 15-19 and 23 have been withdrawn from consideration. Claims 1-33 are pending.

A telephone interview between the Examiner and Arthur Ortega (one of the applicant's undersigned attorneys) was held on September 11, 2006. The applicants and Mr. Ortega wish to thank the Examiner for her time and consideration for the interview. During the interview, claim 1 in view of the Wright reference was discussed. No agreement was reached.

In light of the remarks to follow, reconsideration and allowance of this application are respectfully requested.

Claim Rejections 35 USC 102

Claims 1, 20 and 24 are rejected under 35 U.S.C. 102(e) as being anticipated by Wright et al. (US 6,674,924).

It is respectfully submitted that Wright does not disclose claims 1, 20 and 24 for at least the following reasons.

Claim 1 of the present invention recites a system for routing a document to a desired location that includes:

> means for extracting data from the document to be routed, the document being contained on a physical or electronic media; and
> means for **routing** the extracted data **and** the document to the desired location **depending on the extracted data, the extracted data comprising** at least one of **a content of and a type of the document**. (Emphasis added).

In the present invention, the extracted data includes at least one of the content and type of document. For example, the type of document may include, but is not limited to, an insurance claim or mortgage application. (See paragraph [0035] of the present application.) In this example, if the type of document is a mortgage application, the content of the document may include field names and their associated values. For

8

example, the field may be a person's first name and the associated value may be John. (See paragraphs [0037-0038] of the present application.)

Moreover, the system routes the extracted data and document based on the extracted data which includes the content and type of document. For example, routing may be derived from, but is not limited to, the type of document, such as if the document is a purchase order as opposed to a mortgage application. (See paragraphs [0044-0045] of the present application.) Routing may also be based on, but is not limited to, the content of the document such as field names and their associated values extracted from the document. (See paragraphs [0044-0045] of the present application.)

Furthermore, the system routes both the extracted data and the document based on the extracted data to a desired location. For example, based on the extracted data from the document, the document may be routed to an archive and/or to another location, such as branch offices or departmental sites for additional services. Further, based on the extracted data from the document, the extracted data itself, including, for example, text and image data, may be routed to a certain destination, or to multiple destinations. (See paragraph [0044] of the present application.)

Applicants respectfully assert that the claimed invention is not disclosed in the Wright reference for at least the following reasons.

First, Wright does not disclose a system that extracts data that includes the content and type of document as in the present invention. In the office action (See page 3), the Examiner asserted, in part,

> Wright discloses that a globally unique identifier is applied to the paper-base document, and the separate identifier may be placed on each page of a paper-based document prior to scanning (col 7, lines 41-50). When

9

the paper-based document is subsequently scanned, an image of the paper-based document including the globally unique document identifier is created (col 7, lines 50-52). Such a disclosure teaches means for scanning the document and producing an electronic file comprising data representing a type of and content of the document.

The Examiner appears to be interpreting the extraction of the globally unique identifier from the document as equivalent to the extraction of data in the present invention.

Applicants respectfully disagree for at least the following reasons. As recited in claim 1 of the present invention, the extracted data comprises content of and type of the document. In contrast, as explained in Wright (See col. 7, lines 52-55),

The image of the paper based document is then sent to the paper gateway system 125, where the previously-determined document **identifier** is extracted from the image. (Emphasis added)

Thus, in Wright, it is the identifier that is extracted from the document. The identifier is simply the globally unique identifier that was <u>attached</u> to the document before scanning and not part of the original document. As explained in Wright (See col. 5, lines 20-24),

Finally the nature of the globally unique, document identifier allows the labels to be attached to different types of documents **without** any predetermined relationship between the **document**, the documents **content** and the pre-printed label. (Emphasis added)

Indeed, the identifier is <u>not</u> part of the original document and clearly does <u>not</u> represent or provide an indication of the content and type of the document as in the present invention. Thus, Wright does not disclose this feature of the present invention for at least these reasons.

Second, Wright does not route a document based on the <u>extracted data</u> which includes the content and type of the

10

document as in the present invention. In the office action (page 3), the Examiner asserted, in part,

> The document filer checks a database of filing instructions to determine where and how the document is to be filed.

The Examiner appears to suggest that the document is processed according to instructions which are derived from the extracted data.

Applicants respectfully disagree for at least the following reasons. As recited in claim 1 of the present invention, the data and the document are routed <u>based</u> on the extracted data which includes the content and type of the document. In contrast, the filing instructions stored in the database of Wright are not based on data extracted from the document. Rather, the instructions are specified by the user independent of the document itself. As explained by Wright (See col. 18, lines 40-44),

> These instructions may have been specified by the user when setting up their account, or during the indexing procedure, or may have been specified at any other time (such as using a web site for this purpose).

It is clear that any instructions for processing the document are not extracted from the document itself. Thus, Wright does not disclose this feature of the present invention for at least these reasons.

Third, Wright fails to disclose a system that routes <u>both</u> the extracted data <u>and</u> the document based on the extracted data to the desired location as in the present invention. As explained above, in the present invention, the extracted data includes data extracted from the same document being routed. In contrast, as mentioned above, Wright does not extract data from the document as in the present invention. Thus, Wright does not route data extracted from the document as in the present

invention. At most Wright routes the document which includes the identifier. However, as explained above, in Wright, the identifier, which has been previously attached to the document, does not represent the type and content of the document. Thus, Wright does not route the data _and_ the document based on the extracted data as in the present invention. Therefore, Wright fails to disclose this feature of the present invention for at least these reasons.

Claims 20 and 24 recite similar language as claim 1. Therefore, claims 20 and 24 should be allowable for at least the same reasons as claim 1.

Thus, Applicants respectfully assert that Wright fails to disclose claims 1, 20 and 24 of the present invention for at least the above reasons.

Claim Rejections 35 USC 103

Claims 2, 3, 5-9, 11, 14, 21, 22 and 25-33 are rejected under 35 U.S.C. 103(a) as being unpatentable over Wright in view of Melen (US 6,426,806). Claims 4, 10, 12 and 13 are rejected under 35 U.S.C. 103(a) as being unpatentable over Wright in view of Melen and some combinations of other references.

Independent claims 2, 3, 21, 22, 25-27 recite somewhat similar limitations as claim 1 above and thus should be patentably distinguishable over Wright for at least those reasons. Furthermore, claims 4, 5-9, 10, 11, 12, 13, 14 and 27-33 depend from one of the independent claims, and least due to such dependency, are patentably distinguishable from Wright as well as any combination of references that include Wright.

In addition, regarding claims 2, 3, 21, 22 and 25-27, Melen does not fix the deficiencies of Wright for at least the following reasons.

The invention expressed by claims 2, 3, 21, 22 and 25-27 compares the extracted data to predetermined business rules to

12

see if the extracted data complies with the rules. Comparing the extracted data to a customer's business rules is advantageous. For example, in one aspect, it may take into account the business rules applicable to the standards or practices of a business or industry to perform compliance checking and to tailor the document capture and management specifically to the customer's business. Thus, if a customer is in the insurance industry and a claim is being filed, the system of the present invention would check to see if the First Name and Last Name fields contain non-null values. If the customer is in the banking industry and a person is filing a loan application, the system would check to see if the Loan Amount field had an associated value less than 300,000 unless the Jumbo Loan field had an associated value "yes". (See paragraph [0038] of the present application.)

In the office action (page 5), the Examiner asserted, in part,

> Wright fails to specifically disclose comparing data to one or more predetermined business rules.
> Melen discloses that the CPU compares the tentative identifier (or the scanned control sheet information) to the list of existing identifiers to determine whether any existing identifier matches tentative identifier.

The Examiner went on to state that it would have been obvious to combine Wright with Melen.

Applicants respectfully disagree for the following reasons.

One skilled in the art would not have been motivated to combine the teachings of Wright with Melen. As explained above, Wright simply extracts an identifier from the document and such extraction does not include data representing the type and content of the document. Thus, even if Wright was combinable with Melen, the combination at most would result in a system that compares an identifier to determine whether it matches

another identifier. To one skilled in the art, such a system is not necessary because the identifiers are sequential and therefore already compliant. Thus, there is no reason for further checking. Moreover, as explained above, in the present invention, business rules are used to determine if the content of the document is compliant. In contrast, the Melen system simply obtains an identifier from a control sheet to determine a location to which the scanned document should be routed. Such a determination is not based on business rules as in the present invention. Therefore, the claimed invention as expressed by claims 2, 3, 21, 22 and 25-27 is patentable over Wright in view of Melen for these additional reasons.
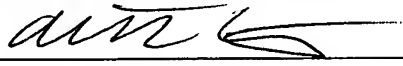
As it is believed that all of the rejections set forth in the Office Action have been fully met, favorable reconsideration and allowance are earnestly solicited.

If, however, for any reason the Examiner does not believe that such action can be taken at this time, it is respectfully requested that he telephone Applicants' attorney at (908) 654-5000 in order to overcome any additional objections which he might have.

If there are any additional charges in connection with this requested amendment, the Examiner is authorized to charge Deposit Account No. 12-1095 therefor.

Dated: September 15, 2006   Respectfully submitted,

By _____
Arthur S. Ortega
Registration No.: 53,422
LERNER, DAVID, LITTENBERG,
    KRUMHOLZ & MENTLIK, LLP
600 South Avenue West
Westfield, New Jersey   07090
(908) 654-5000
Attorney for Applicants

692644_1.DOC

14